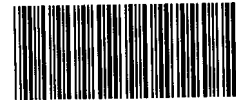


Prisk, Carlyn

ORIGINAL

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, December 20, 2016 11:54 AM
To: Prisk, Carlyn
Subject: UPS Delivery Notification, Tracking Number 1ZA43F71NT94427416



SEMS DocID

2248285



Your package has been delivered.

Delivery Date: Tuesday, 12/20/2016

Delivery Time: 11:48 AM

At the request of US EPA, this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:

1ZA43F71NT94427416

Ship To:

Mr. John Korman, CEO
Korman Residential Properties
1787 SENTRY PKWY W
ROOM 420
BLUE BELL, PA 19422
US

UPS Service:

UPS NEXT DAY AIR

Number of Packages:

1

Weight:

1.0 LBS

Delivery Location:

RECEIVER

Signed by:

CORDES



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Shipment Receipt

Transaction Date: 19 Dec 2016

Tracking Number:

1ZA43F71NT94427416

1 Address Information

Ship To:
Korman Residential Properties
Mr. John Korman, CEO
1787 Sentry Parkway West
VEVA 18, Suite 420
BLUE BELL PA 19422
Telephone:215-814-2625

Ship From:
US EPA
Sarah Thomas
1650 ARCH ST
PHILADELPHIA PA 19103
Telephone:215-814-3166
email:thomas.sarah@epa.gov

Return Address:
US EPA
Carlyn Prisk
1650 ARCH ST
PHILADELPHIA PA 19103
Telephone:215-814-2625
email:thomas.sarah@epa.gov

2 Package Information

Weight	Dimensions / Packaging	Declared Value	Reference Numbers
1. 1.0 lbs (1.0 lbs billable)	UPS Letter		

3 UPS Shipping Service and Shipping Options

Service: UPS Next Day Air
Delivery Date: 10:30 AM Tuesday, Dec 20, 2016
Shipping Fees Subtotal: 27.33 USD
Transportation: 26.09 USD
Fuel Surcharge: 1.24 USD

Additional Shipping Options
Deliver Without Signature 0.00 USD
Package1: Deliver Without Signature
Quantum View Notify E-mail Notifications: No Charge
1 Thomas.Sarah@epa.gov: Delivery
2 Prisk.Carlyn@epa.gov: Delivery

4 Payment Information**Bill Shipping Charges to:** Shipper's Account A43F71

Shipping Charges:	27.33 USD
Subtotal Shipping Charges:	27.33 USD
Daily rates were applied to this shipment	
Total Charged:	27.33 USD

Note: This document is not an invoice. Your final invoice may vary from the displayed reference rates.

* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 19 2016

BY OVERNIGHT DELIVERY

Korman Residential Properties
John Korman, CEO
1787 Sentry Parkway West
VEVA 18, Suite 420
Blue Bell, PA 19422

**Re: Required Submission of Information
Lower Darby Creek Site, Clearview Landfill
Darby Township, Delaware County, and Philadelphia, Pennsylvania**

Dear Mr. Korman:

The U.S. Environmental Protection Agency ("EPA") is seeking information related to the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment from the Clearview Landfill, which comprises Operable Unit 1 of the Lower Darby Creek Site ("Site"), located along Darby Creek in Darby, Pennsylvania. EPA is currently investigating contamination on residential properties and open space areas in the Eastwick neighborhood of Philadelphia, adjacent to and near the Site ("the Residential Areas"). Please refer to Attachments 1 and 2 for a description and map of the Residential Areas being investigated and/or remediated. Specifically, EPA is seeking information related to the actions by, or on behalf of, Korman Corporation ("Korman") and/or New Eastwick Corporation ("NEC") and/or New Eastwick Joint Venture ("NEJV") related to properties within the Residential Areas. The specific information required is attached to this letter as Enclosure E. Further directions regarding your response to this letter can be found in Enclosures A, B, C, and D.

Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), EPA has the authority to require Korman Residential Properties ("KRP"), to furnish all information and documents in its possession, custody, or control, or in the possession, custody, or control of any of its employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Please respond in writing to this required submission of information within **twenty (20) business days** of your receipt of this letter.

If, for any reason, KRP does not provide all information responsive to this letter, then in its answer to EPA KRP should: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

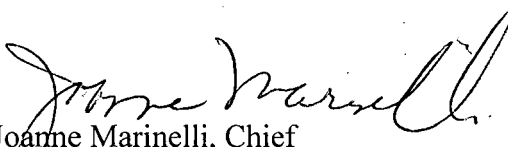
All documents and information should be sent to:

Carlyn Winter Prisk (3HS62)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Ms. Prisk at (215) 814-2625, or have your attorney contact Senior Assistant Regional Counsel Bonnie A. Pugh at (215) 814-2680.

Sincerely,


Joanne Marinelli, Chief
Cost Recovery Branch

Attachment 1: Description of Residential Areas

Attachment 2: Map of Residential Areas.

Enclosures: A. Business Confidentiality Claims/Disclosure of Your Response to
EPA Contractors and Grantees
B. List of Contractors that May Review Your Response
C. Definitions
D. Instructions
E. Information Requested

cc: Bonnie Pugh (3RC42)
Carlyn Prisk (3HS62)
Josh Barber (3HS21)
Noreen Wagner (PADEP)

Attachment 1: Description of Residential Areas

Southern Residential Area

Between the northern edge of S. 80th St. and the southern edge of S. 84th St., and, between the eastern edge of Lindbergh Blvd. and the county boundary with Delaware County. *

Northern Residential Area

Between the filled area immediately north of S. 78th St. to the Eastwick Regional City Park, and, between the eastern edge of Venus Place and the county boundary with Delaware County and/or Cobbs Creek.



Source: Esri, DigitalGlobe, GeoEye, Icube, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

- Historical Extent of Clearview Landfill
- County Boundary Line

Data Sources
Imagery: ESRI Bing Service

Coordinate System:
State Plane Pennsylvania, South FIPS 3702
Linear Unit: Foot US

Datum: D North American 1983 (NAD 83)



0 287.5 575
Feet

Lower Darby Creek Area Site
Delaware and Philadelphia Counties, PA

Attachment 2 Clearview Landfill Site Features

TDD#: W501-16-06-001
Contract: EP-S3-15-02
Prepared: 12/9/2016



Enclosure A

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See, Enclosure B) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreements(s) under the Senior Environmental Employee Program ("SEE Enrollees"). The SEE Program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE Enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed. Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure B, you must notify EPA in writing at the time you submit such documents.

Enclosure B

[rev. 12/2016]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.

Contract # EP-W-11-025

Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton

Contract # EP-W-11-016

CDM-Federal Programs Corporation

Contract # EP-S3-07-06

Subcontractors: CDI-Infrastructure, LLC d/b/a L.R.
Kimball
Avatar Environmental LLC
Terradon Corporation

Cherokee Nation Assurance, LLC

Contract #EP-S3-14-01

EA Engineering, Science and Technology, Inc.

Contract #EP-S3-07-07

Subcontractor: URS

Eisenstein Malanchuck, LLP

Contract #EP-W-13-006

Subcontractors: R. M. Fields International, LLC

Hydrogeologic (HGL)

Contract #EP-S3-07-05

Subcontractor: CH2MHill
Sullivan International

Weston Solutions

Contract #EP-S3-1502

Tech Law, Inc. (Removal Program)

Contract #EP-S3-1503

Tetra Tech NUS, Inc.

Contract #EP-S3-07-04

Kemron Environmental Services, Inc.

Contract #EP-S3-12-01,

Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.

Contract #EP-S3-12-02,

Subcontractors: Aerotek, Inc.,
Tetra Tech, Inc.

Environmental Restoration, LLC

Contract # EP-S3-12-03

Subcontractors: Aerotek, Inc
Haas Environmental, Inc,
Hertz

Northstar Federal Services, Inc.

Contract # EP-S3-12-05

ICF International

Contract # EP-BPA-12-W-0003

Cooperative Agreements

National Association of Hispanic Elderly

CA# CQ-835398

National Older Workers Career Center

CA# Q-835621

Enclosure C

Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.
2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.
3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to Section 9602 of CERCLA, (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of the Solid Waste Disposal Act (42 U.S.C. § 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act, 42 U.S.C. § 6901 *et seq.*, has been suspended by Act of Congress), (d) any toxic pollutant listed under Section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act, 42 U.S.C. § 7412, and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical

deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, 42 U.S.C. § 2011 et seq., if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of such Act, 42 U.S.C. § 2210, or, for the purposes of Section 9604 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under 42 U.S.C. §§ 7912(a)(1) and 7942(a) and (d) the normal application of fertilizer.
6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.
7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

Enclosure D

Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure A, *Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees*. You must clearly mark such information by either stamping or using any other form of notice that such information is a trade secret, proprietary, or company confidential. To ensure to the greatest extent that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of each question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.
3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question or subpart of the question to which the document(s) responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure C, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure C. Those terms shall have the meaning set forth in Enclosure C any time such terms are used in this Information Request and/or its Enclosures.

Enclosure E

Information Required

In the following questions, the term "Korman" refers to the Korman Corporation and any related entity which participated in activities as part of the of the Eastwick Urban Renewal Plan. "NEC" refers to the New Eastwick Corporation. "NEJV" refers to the Joint Venture by and between Korman and NEC. The terms "you", "your", and KRP refer to Korman Residential Properties, the recipient of this information request.

1. What was (were) the specific Korman entity(ies) which performed any activities in the Residential Areas as part of the Eastwick Urban Renewal Plan.
2. For each party named in response to Question 1, describe its corporate history in detail. Your answer should include specific information on the incorporation/formation, any mergers and acquisitions, name changes, asset purchases/sales etc. involving any of the named entities and include complete copies of all relevant documents.
3. For each party names in response to Question 1, explain how it is related to KRP or any currently existing entity.
4. Did Korman, or anyone on behalf of, under contract with, or at the direction of Korman, conduct surface grading operations on any properties, including to change the elevation or grade or any streets, within the Residential Areas at any time, including as part of the activities conducted under the Eastwick Urban Renewal Plan? If so, provide the following:
 - a. A complete list of every Residential Property graded by, on behalf of, under contract with, or at the direction of Korman.
 - b. The name and contact information of any party which conducted grading on behalf of, under contract with, or at the direction of Korman.
 - c. Complete copies of any documents related to the surface grading of any of the properties in the Residential Areas.
5. At the time of their development as part of the Eastwick Urban Renewal Plan, did Korman, or anyone on behalf of, under contract with, or at the direction of Korman, encounter waste of any sort on any of the properties in the Residential Areas? If so, provide the following:
 - a. A complete list of every property in the Residential Areas on which such waste was discovered.
 - b. A description of the nature of the waste for each property in the Residential Areas.
 - c. A detailed description of the sampling of the waste including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;

- iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.
 - d. A detailed explanation of the disposition of the waste (e.g., used as fill in the Residential Areas, used as fill elsewhere, relocated or consolidated onto the Clearview Landfill, landfilled elsewhere, incinerated, etc.), including:
 - i. the dates on which such disposition occurred;
 - ii. the names and contact information party(ies) who conducted the disposition;
 - iii. the ultimate location(s) for the disposition of the waste.
 - e. Complete copies of any documents related to the foregoing.
6. Did Korman, or anyone on behalf of, under contract with, or at the direction of Korman, bring fill in to any of the properties or any portion of the Residential Areas, including to change the grade or elevation of any streets? If so provide the following:
- a. A complete list of every property or portion of the Residential Areas on which such fill was deposited.
 - b. The dates on which such fill was deposited on each property within the Residential Areas listed in responses to 6a.
 - c. The name(s) and contact information of the source of any fill brought to each property within the Residential Areas listed in response to 6a.
 - d. A description of the nature of the fill for each property in the Residential Areas
 - e. A detailed description of the sampling of the fill including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;
 - iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.
 - f. Complete copies of any documents related to the filling of any of the properties within the Residential Areas.
7. Provide the names and contact information of any current or former Korman employee who might have information about Korman's activities, or taken on behalf of, under contract with, or at the direction of Korman, as part of the Eastwick Urban Renewal Plan within the Residential Areas.
8. Describe the history of NEC in detail. Your answer should include specific information on the incorporation/formation, any mergers and acquisitions, name changes, asset purchases/sales etc. involving any of the named entities and include complete copies of all relevant documents.

9. Explain how NEC is related to KRP or any currently existing entity.

10. Did NEC, or anyone on behalf of, under contract with, or at the direction of NEC, conduct surface grading operations on any properties, including to change the elevation or grade or any streets, within the Residential Areas at any time, including as part of the activities conducted under the Eastwick Urban Renewal Plan? If so, provide the following:

- a. A complete list of every Residential Property graded by, on behalf of, under contract with, or at the direction of NEC.
- b. The name and contact information of any party which conducted grading on behalf of, under contract with, or at the direction of NEC.
- c. Complete copies of any documents related to the surface grading of any of the properties in the Residential Areas.

11. At the time of their development as part of the Eastwick Urban Renewal Plan, did NEC, or anyone on behalf of, under contract with, or at the direction of NEC, encounter waste of any sort on any of the properties in the Residential Areas? If so, provide the following:

- a. A complete list of every property in the Residential Areas on which such waste was discovered.
- b. A description of the nature of the waste for each property in the Residential Areas.
- c. A detailed description of the sampling of the waste including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;
 - iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.
- d. A detailed explanation of the disposition of the waste (e.g., used as fill in the Residential Areas, used as fill elsewhere, relocated or consolidated onto the Clearview Landfill, landfilled elsewhere, incinerated, etc.), including:
 - i. the dates on which such disposition occurred;
 - ii. the names and contact information party(ies) who conducted the disposition;
 - iii. the ultimate location(s) for the disposition of the waste.
- e. Complete copies of any documents related to the foregoing.

12. Did NEC, or anyone on behalf of, under contract with, or at the direction of NEC, bring fill in to any of the properties or any portion of the Residential Areas, including to change the grade or elevation of any streets? If so provide the following:

- a. A complete list of every property or portion of the Residential Areas on which such fill was deposited.
 - b. The dates on which such fill was deposited on each property within the Residential Areas listed in responses to 12a.
 - c. The name(s) and contact information of the source of any fill brought to each property within the Residential Areas listed in response to 12a.
 - d. A description of the nature of the fill for each property in the Residential Areas
 - e. A detailed description of the sampling of the fill including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;
 - iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.
 - f. Complete copies of any documents related to the filling of any of the properties within the Residential Areas.
13. Provide the names and contact information of any current or former NEC employee who might have information about NEC's activities, or taken on behalf of, under contract with, or at the direction of NEC, as part of the Eastwick Urban Renewal Plan within the Residential Areas.
14. Describe the history of NEJV in detail. Your answer should include specific information on the incorporation/formation, any mergers and acquisitions, name changes, asset purchases/sales etc. involving any of the named entities and include complete copies of all relevant documents.
15. Explain how NEJV is related to KRP or any currently existing entity.
16. Did NEJV, or anyone on behalf of, under contract with, or at the direction of NEJV, conduct surface grading operations on any properties, including to change the elevation or grade or any streets, within the Residential Areas at any time, including as part of the activities conducted under the Eastwick Urban Renewal Plan? If so, provide the following:
- a. A complete list of every Residential Property graded by, on behalf of, under contract with, or at the direction of NEJV.
 - b. The name and contact information of any party which conducted grading on behalf of, under contract with, or at the direction of NEJV.
 - c. Complete copies of any documents related to the surface grading of any of the properties in the Residential Areas.

17. At the time of their development as part of the Eastwick Urban Renewal Plan, did NEJV, or anyone on behalf of, under contract with, or at the direction of NEJV, encounter waste of any sort on any of the properties in the Residential Areas? If so, provide the following:

- a. A complete list of every property in the Residential Areas on which such waste was discovered.
- b. A description of the nature of the waste for each property in the Residential Areas.
- c. A detailed description of the sampling of the waste including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;
 - iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.
- d. A detailed explanation of the disposition of the waste (e.g., used as fill in the Residential Areas, used as fill elsewhere, relocated or consolidated onto the Clearview Landfill, landfilled elsewhere, incinerated, etc.), including:
 - i. the dates on which such disposition occurred;
 - ii. the names and contact information party(ies) who conducted the disposition;
 - iii. the ultimate location(s) for the disposition of the waste.
- e. Complete copies of any documents related to the foregoing.

18. Did NEJV, or anyone on behalf of, under contract with, or at the direction of NEJV, bring fill in to any of the properties or any portion of the Residential Areas, including to change the grade or elevation of any streets? If so provide the following:

- a. A complete list of every property or portion of the Residential Areas on which such fill was deposited.
- b. The dates on which such fill was deposited on each property within the Residential Areas listed in responses to 18a.
- c. The name(s) and contact information of the source of any fill brought to each property within the Residential Areas listed in response to 18a.
- d. A description of the nature of the fill for each property in the Residential Areas
- e. A detailed description of the sampling of the fill including:
 - i. the dates on which it was conducted;
 - ii. the name(s) and contact information of any party(ies) who performed the sampling;
 - iii. the name(s) and contact information of the lab(s) which conducted any analysis; and
 - iv. the complete results of that analysis.

- f. Complete copies of any documents related to the filling of any of the properties within the Residential Areas.

19. Provide the names and contact information of any current or former NEJV employee who might have information about NEC's activities, or taken on behalf of, under contract with, or at the direction of NEJV, as part of the Eastwick Urban Renewal Plan within the Residential Areas.